

Bednarz Decl.

EXHIBIT 3



Frank Bednarz <frank.bednarz@hlli.org>

Correspondence re: In re Flint Water Cases, No. 16-cv-10444-JEL-MKM (E.D. Mich.)

Stern, Corey <CStern@levylaw.com>

Fri, Mar 26, 2021 at 8:37 AM

To: Frank Bednarz <frank.bednarz@hlli.org>

Cc: Jessica Weiner <jweiner@cohenmilstein.com>, "hunter@napolilaw.com" <hunter@napolilaw.com>, mpitt <mpitt@pittlawpc.com>, "cmcgehee@pittlawpc.com" <cmcgehee@pittlawpc.com>, Theodore Leopold <tleopold@cohenmilstein.com>, Leslie Mitchell Kroeger <lkroeger@cohenmilstein.com>, "Joseph M. Sellers" <JSellers@cohenmilstein.com>, "Kit A. Pierson" <kpierson@cohenmilstein.com>, Emmy Levens <elevens@cohenmilstein.com>, Alison Deich <ADeich@cohenmilstein.com>, Theodore Frank <ted.frank@hlli.org>

Mr. Bednarz:

While I have a sense of what Mr. Shkolnik's position likely he is, he and I are not monolithic, and I anticipate he will respond if/when and with what he feels is appropriate.

Best,

Corey M. Stern
Levy Konigsberg, LLP
800 Third Ave, 11th Floor
New York, New York 10022
(212)605-6298
(212)605-6290 (facsimile)
www.levylaw.com

On Mar 25, 2021, at 11:58 AM, Frank Bednarz <frank.bednarz@hlli.org> wrote:

Mr. Stern,

Thank you for your quick reply. I'm sorry that you misread my inquiry as an attack on anyone's character. I understand you find this frustrating; I would too!

To avoid any ambiguity, does Mr. Shkolnik—who has been copied since my first email—share this position?

Best regards,

Frank

M. Frank Bednarz
Hamilton Lincoln Law Institute
1145 E. Hyde Park Blvd. Unit 3A
Chicago, IL 60615
801-706-2690

On Thu, Mar 25, 2021 at 10:21 AM Stern, Corey <CStern@levylaw.com> wrote:

Mr. Bednarz:

I was appointed Co-Liaison Counsel by Judge Levy, and earlier I was appointed Lead Counsel for Plaintiffs in the state court litigation. I've added Hunter Shkolnik here, who was also appointed by Judge Levy as Co-Liaison Counsel.

I fully agree with Mr. Leopold.

Further, I am not a lawyer for any class action case in this litigation.

79.5% of the money in the settlement is earmarked for minors, who are not part of the settlement class. Any adult who hired an attorney is not part of the settlement class. It is likely that 90% of the money paid by settling defendants will go to non-class members, each of whom has a retainer – a contract – wherein an agreement was made regarding the fees they were willing to pay to their lawyers for representing them.

I feel strongly, having reviewed your communications, that you have not actually read the settlement agreement. I do not believe you have any idea what this settlement says, how it is structured, and how money is paid or to whom. I think you found media pieces that support what you generally do, and your general narrative, and you decided to jump in.

Unless ordered by a court, I will provide you nothing.

Further, despite not always (to put it lightly) agreeing with Mr. Leopold and Mr. Pitt, they and their team have worked tirelessly and endlessly for the last five years for the people of Flint. I have been with them and watched them work around the clock – in the middle of the night, on weekends – for their clients. As have I for mine. The hours they poured into this, away from their families, their children, their spouses should be commended. It was selfless and it was honorable.

I am offended by you.

There is nothing in the world more frustrating than a Monday Morning QB, a backseat driver, or someone who seeks to make their living or enhance their reputation critiquing someone else's efforts.

And if you continue down this path, I look forward to litigating these issues before the Court.

Best,

Corey M. Stern

Levy Konigsberg, LLP

800 Third Avenue, 11th Floor

New York, New York 10022

(212)605-6298

(212)605-6290 (facsimile)

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From: Frank Bednarz <frank.bednarz@hlli.org>
Date: Thursday, March 25, 2021 at 10:56 AM
To: Jessica Weiner <jweiner@cohenmilstein.com>
Cc: Stern, Corey <CStern@levylaw.com>, hunter@napolilaw.com
<hunter@napolilaw.com>, mpitt <mpitt@pittlawpc.com>, cmcgehee@pittlawpc.com <cmcgehee@pittlawpc.com>, Theodore Leopold <tleopold@cohenmilstein.com>, Leslie Mitchell Kroeger <LKroeger@cohenmilstein.com>, Joseph M. Sellers <JSellers@cohenmilstein.com>, Kit A. Pierson <kpierson@cohenmilstein.com>, Emmy Levens <elevens@cohenmilstein.com>, Alison Deich <ADeich@cohenmilstein.com>, Theodore Frank <ted.frank@hlli.org>
Subject: Re: Correspondence re: In re Flint Water Cases, No. 16-cv-10444-JEL-MKM (E.D. Mich.)

Thank you Jess,

Mr. Leopold's letter says "we," but it's not clear to me that this is the only position of your firm or perhaps Co-Lead Class Counsel, or whether he is also speaking for Co-Liaison Counsel.

Could your or one of the other copied counsel confirm that this is the position of all four firms?

Thanks in advance,

Frank

M. Frank Bednarz

Hamilton Lincoln Law Institute

1145 E. Hyde Park Blvd. Unit 3A

Chicago, IL 60615

801-706-2690

On Wed, Mar 24, 2021 at 11:10 AM Jessica Weiner <jweiner@cohenmilstein.com> wrote:

Mr. Bednarz:

Please see the attached correspondence.

Kind regards,

Jess

From: Frank Bednarz <frank.bednarz@hlli.org>

Sent: Wednesday, March 24, 2021 10:23 AM

To: cstern@levylaw.com; hunter@napolilaw.com; mpitt <mpitt@pittlawpc.com>; cmcgehee@pittlawpc.com; Theodore Leopold <tleopold@cohenmilstein.com>; Leslie Mitchell Kroeger <LKroeger@cohenmilstein.com>; Joseph M. Sellers <JSellers@cohenmilstein.com>; Kit A. Pierson <kpierson@cohenmilstein.com>; Emmy Levens <elevens@cohenmilstein.com>; Jessica Weiner <jweiner@cohenmilstein.com>; Alison Deich <ADeich@cohenmilstein.com>

Cc: Theodore Frank <ted.frank@hlli.org>

Subject: Re: Correspondence re: In re Flint Water Cases, No. 16-cv-10444-JEL-MKM (E.D. Mich.)

Counsel:

Please advise which, if any, of the requested information will be provided.

Best regards,

Frank

M. Frank Bednarz

Hamilton Lincoln Law Institute

1145 E. Hyde Park Blvd. Unit 3A

Chicago, IL 60615

801-706-2690

On Mon, Mar 22, 2021 at 11:32 AM Frank Bednarz <frank.bednarz@hlli.org> wrote:

Hello counsel,

Please find attached correspondence regarding the fee request file in the Flint Water Cases.

Best regards,

Frank

M. Frank Bednarz

Hamilton Lincoln Law Institute

1145 E. Hyde Park Blvd. Unit 3A

Chicago, IL 60615

801-706-2690

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